

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
19-CR-104 (JNE/TNL)

UNITED STATES OF AMERICA,)	SUPERSEDING INDICTMENT
)	
Plaintiff,)	
)	18 U.S.C. § 2
v.)	21 U.S.C. § 841(a)(1)
)	21 U.S.C. § 841(b)(1)(A)
(1) MATTHEW JOSEPH HINES,)	21 U.S.C. § 841(b)(1)(B)
)	21 U.S.C. § 846
(2) JAKE DANIEL SCRABECK,)	21 U.S.C. § 853
)	
(3) MASON PAUL STUHLDREHER, and)	
)	
(4) JAIME ALEJANDRO AGUIRRE-REA,)	
)	
Defendants.)	

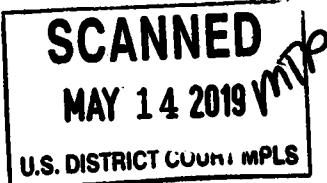
THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Conspiracy To Distribute Methamphetamine)

Beginning in or about approximately December 2018, and continuing through in or about February 2019, the exact dates being unknown to the grand jury, in the State and District of Minnesota and elsewhere, the defendants,

**MATTHEW JOSEPH HINES,
JAKE DANIEL SCRABECK,
MASON PAUL STUHLDREHER, and
JAIME ALEJANDRO AGUIRRE-REA,**

did knowingly and intentionally conspire with others, known and unknown to the grand jury to distribute 500 grams or more of a mixture and substance containing a detectable



United States v. Matthew Joseph Hines et al.

amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 846.

COUNT 2
(Distribution of Methamphetamine)

On or about January 17, 2019, in the State and District of Minnesota, the defendant,

JAKE DANIEL SCRABECK,

aided and abetted by others, did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 3
(Possession with the Intent To Distribute Methamphetamine)

On or about February 9, 2019, in the State and District of Minnesota, the defendant,

MASON PAUL STUHLDREHER,

aiding and abetting others, and aided and abetted by others, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

United States v. Matthew Joseph Hines et al.

COUNT 4

(Possession with the Intent To Distribute Methamphetamine)

On or about February 9, 2019, in the State and District of Minnesota, the defendant,

MATTHEW JOSEPH HINES,

aiding and abetting others, and aided and abetted by others, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATIONS

Counts 1-4 of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

If convicted of any of Counts 1-4 of this Indictment, the defendants,

**MATTHEW JOSEPH HINES,
JAKE DANIEL SCRABECK,
MASON PAUL STUHLDREHER, and
JAIME ALEJANDRO AGUIRRE-REA,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds obtained directly or indirectly as a result of each such violation, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said

United States v. Matthew Joseph Hines et al.

violations, including but not limited to:

- a. \$14,270.00 seized on February 9, 2019, in Rochester, Minnesota;
- b. \$21,480.00 seized on February 9, 2019, in Inver Grove Heights, Minnesota;
- c. a white 2015 Chevrolet Suburban, VIN 1GNSKJKC6FR609914, Minnesota license plate number 218RE, seized on April 17, 2019; and
- d. a white 2019 GMC Truck, VIN 1GT42WEY5KF155480, Minnesota license plate number CKC347, seized on April 17, 2019.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON